

**LAW OFFICES OF EDWARD MANIBUSAN**

**Edward Manibusan, Esq.**

**Steven M. Newman, Esq.**

P.O. Box 7934 SVRB

Tun Antonio Apa Road

Saipan, MP 96950

Telephone No. 235-6520

Facsimile No. 235-6522

e-mail: emlaw@vzpacifica.net

Attorneys for Defendants LK Corporation,  
d.b.a. Rota Handicraft and Lee Byung Deuk

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

SAIPAN HANDICRAFT,

Plaintiff,

vs.

MICRONESIA WOODCRAFT ENT., INC.,  
ET. AL,

Defendants.

Civil Action No. 05-0040

DEFENDANTS LK CORPORATION  
CORPORATION, dba ROTA  
HANDICRAFT and LEE  
BYUNG DEUK ANSWER TO  
PLAINTIFFS REQUEST FOR  
PRODUCTION

Date:

Time:

Judge: Hon. Alex R. Munson

COMES NOW Defendants LK Corporation (LK Corp.) and Lee, Byung Deuk (Lee), by and  
through undersigned counsel, and hereby sets forth its Answer to Plaintiff's Request for Production.

**II. RESPONSE**

Request No. 1: All documents that report on, describe, refer to, and/or relate to your use of Bo  
Jo Bo Doll.

1 Request No. 2: All documents which establish the date(s) stated in your response to  
2 Interrogatory No. 1 of Plaintiff's Interrogatories.\

3  
4 Request No. 3: All documents which you contend establish or public use of Bo Jo Bo Dolls.

5  
6 Request No. 4: All documents which you contend establish that the Bo Jo Bo Dolls have been  
7 in continuous use from the date of first use to the present, including but not  
8 limited to any and all documents relating to any periods of non-use.

9  
10 Rota Handicraft is not in possession of any such documents.

11  
12 Request No. 5: The contracts, agreements, licenses, consents, and the like, and any  
13 amendments thereto, to which you are a party with each with each [sic] buyer,  
14 supplier of materials, retailer and other businesses for the purchase or  
15 distribution of your Bo Jo [sic] dolls.

16  
17 Rota Handicraft is not in possession of any such documents.

18  
19 Request No. 6: All licenses granted to you by any third party with respect to manufacturing,  
20 producing or selling Bo Jo Bo Dolls.

21  
22 Rota Handicraft is not in possession of any such documents.

23  
24 Request No. 7: The documentation which relate to or refer to the origin, conception, selection,  
25 development and adoption of the Bo Jo Bo Doll.

26  
27 Rota Handicraft is not in possession of any such documents.

1 Request No. 8: The documentation that identify, classify, relate to, and/or relate to the actual  
2 and/or intended purchasers and end users, if different, of the Bo Jo Bo Doll by  
3 you.

4  
5 Rota Handicraft has provided herewith copies of its invoices for the years  
6 2006-2008 which identifies the purchasers of its Bo Jo Bo Dolls. See Exhibit  
7 A (Invoices).

8  
9 Request No. 9: The advertisements or promotional literature, whether actually distributed or  
10 not, used or considered for use in connection with your production of the Bo  
11 Jo Bo Doll.

12  
13 Rota Handicraft is not in possession of any such documents.

14  
15 Request No. 10: All documents which establish the damages you contend you have suffered in  
16 your counterclaim.

17  
18 Rota Handicraft refers Plaintiff to those documents provided in Exhibit A.

19  
20 Request No. 11: The documentation, including business gross receipts tax filings, showing your  
21 monthly gross income derived from the sale or distribution of Bo Jo Bo Dolls  
22 from the date of first production through the present.

23  
24 Rota Handicraft has attached copies of its business gross receipt tax filings.  
25 See Exhibit B.

1 Request No. 12: The documentation relating to any revenue losses you claim in your  
2 counterclaim.

3  
4 Rota Handicraft refers Plaintiff to Exhibits A and B.

5  
6 Request No. 13: Each type of label, container, sticker, box, bag, packaging, brochure,  
7 advertisement, website screen print out and/or other means by which Plaintiff  
8 has applied or used (or intends to apply or use) the Bo Jo Bo mark which you  
9 contend infringes on the Bo Jo Bo Dolls you manufacture.

10  
11 Rota Handicraft is not in possession of any Bo Jo Bo Dolls manufactured by  
12 Plaintiff, but refers to Plaintiff's exhibits attached to its Motion for Expanded  
13 Preliminary Injunction.

14  
15 RESPECTFULLY SUBMITTED this 30th day of May 2008.

16  
17 

18 Steven M. Newman, Esq.  
19 Attorney for Defendants LK Corporation,  
20 d.b.a. Rota Handicraft and Lee Byung Deuk.